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The mission of The Earth Day Coalition is to conserve, protect and restore the Earth promoting a dynamic environmental agenda with the people of Northeast Ohio. Est. 1990



June 18, 1999

Dockets Management Branch (HFA-305)

Food and Drug Administration

5630 Fishers Lane, Room 1061

Rockville, MD 20852

4858 '99 JUN 24 A9:52

Re: Docket no. 98N-1038

"Irradiation in the Production, Processing and Handling of Food"

To Whom It May Concern,

I am writing to express my concern regarding the prospect of weakening the labeling requirements of irradiated food. All food and food containing ingredients that have been irradiated should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement must be easy to read and placed in close proximity to the name of the food and the "radura." If the food is not pre-packaged, this information should be displayed in a plaque in plain view adjacent to where the product is displayed for sale.

In order to be clear and use plain understandable language, I feel that irradiation labels required by FDA should include the terms, "treated with radiation" or "treated by radiation." Any phrase using the term 'pasteurization' is misleading because pasteurization is a process of rapid heating and cooling.

I believe the radura, the international symbol of irradiated food, is the symbol which conveys the food processing information needed for irradiated food. However, the requirement for irradiation disclosure should not expire at any time in the future. Even if some consumers become familiar with the radura, this will not be sufficient to inform all consumers. If there is no label, consumers will think there has been no irradiation of food.

Thanks you for consideration of these comments. Please keep me informed of any further activities at your agency concerning irradiated food.

Sincerely,

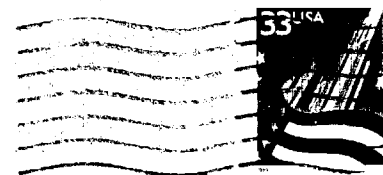
Chris Trepal
Executive Director

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